

# EXHIBIT 58

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity; U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES; U.S. IMMIGRATION  
AND CUSTOMS ENFORCEMENT;  
and the UNITED STATES OF  
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

**DECLARATION OF LUCILA LOERA**

I, Lucila Loera, hereby declare and affirm:

1. I am the Assistant Vice President for Access, Equity, and Achievement at Washington State University (WSU), Washington State's land grant institution and the second largest public research university in the Pacific Northwest. I have been in this position for seven years. However, I have worked in the area of higher education, access and success, for over 20 years in numerous leadership roles, such as Director of Student Support Services and Dean of Students at WSU. I have achieved national recognition for my work in promoting access and opportunity for first-generation, low-income, and underrepresented populations.

2. I have personal knowledge of the facts set forth in this declaration, and I am competent to testify about them.

3. As Assistant Vice President for Access, Equity, and Achievement, I lead WSU's institutional efforts to ensure the access and success of first-generation, low-income, and otherwise underrepresented students in higher education. Among our many activities, programs, and services, the Office of Access, Equity, and Achievement is home to the Office of Multicultural Student Services (MSS), which facilitates the undergraduate experience for multicultural students through culturally relevant programs and services. Our office also houses federally funded programs such as the College Assistance Migrant Program (CAMP), TRIO Student Support Services, and TRIO Upward Bound.

4. The Office of Access, Equity, and Achievement, in particular MSS, assists thousands of students each year, including many students who are registered under the Deferred Action for Childhood Arrivals program (DACA), as well as the Washington Dream Act, also called the REAL Hope Act. Although we do not require students to self-identify as DACA enrollees, I can confirm there are a minimum of 157 undergraduate DACA students currently enrolled at WSU, as well as 44 employees. However, based on my and my staff's observations and interactions with students, I estimate there actually are several hundred DACA students

1 enrolled at WSU each year, many of whom are served by our office. These students participate  
2 in various academic programs across WSU and also play a significant role in WSU's student life  
3 and culture.

4 5. If DACA is rescinded, many of these students will be unable to continue attending  
5 WSU. This is in large part due to financial considerations. If students become ineligible to  
6 work, many of them, as well as their family members, will lose the summer and academic year  
7 employment they need to help pay living and educational expenses. In most cases, these students  
8 will not have funds for tuition, food, or housing since they depend on work to pay as they go. If  
9 DACA is rescinded, many of these students feel they cannot risk continuing their education  
10 because of fear of deportation, and they plan to withdraw from WSU.

11 6. Many DACA students are the first in their family to attend college and are often  
12 seen as the leaders and change agents in their family and communities. Like many Americans,  
13 these students have the dreams and aspirations of Americans seeking a better life through higher  
14 education. Many of these students participate and serve in leadership roles in student  
15 organizations across the WSU campuses. If they are forced to withdraw from WSU, student life  
16 and the overall student experience on campus will be negatively impacted.

17 7. WSU also stands to lose hundreds of thousands of dollars in revenue, including  
18 direct tuition revenue, as well as scholarships and financial aid. Each of these students pays  
19 approximately \$12,000 in tuition per year based on full-time attendance and in-state tuition.  
20 They also may be eligible for state need grants and other scholarships. If DACA is rescinded,  
21 WSU will lose this revenue, and the impact will be significant. Moreover, WSU will lose many  
22 valuable employees and risks significant disruption to its academic enterprise due to the loss of  
23 DACA students who currently are working as research or teaching assistants.

24 8. The threat of rescission of DACA has already been having a negative impact on  
25 the WSU community. DACA students, as well as their many friends, family, and supporters in  
26 the WSU community, are under extreme stress. They are angry and frightened. Many of these

1 students have no memory of the country their parents came from and no connections in that  
2 country. They fear being taken from their families and the only home many of them have ever  
3 known.

4 9. DACA students have had to work extremely hard to get to WSU, and many are  
5 first in their families to attend college. They are high achievers, having done everything that has  
6 been asked of them, and are in college realizing their potential. If DACA is rescinded, many  
7 will have to leave college with debt and no degree. This is a violation of their trust.

8 10. Nearly all of these students have ceased academic and personal international  
9 travel for fear they will not be permitted re-entry into the United States. This negatively impacts  
10 them personally and professionally, and also negatively impacts WSU by limiting the scope of  
11 academic activities in which these members of the WSU community are able to engage.

12 11. I believe that the presence of DACA students and staff on our campus serves to  
13 build diversity and intercultural understanding among all members of our community. Their  
14 presence greatly enriches the educational experience of all WSU students. By impeding WSU's  
15 ability to reach these students and benefit from their presence on campus, the rescission of  
16 DACA directly and immediately negatively impacts WSU's mission as a land-grant institution.  
17 The rescission of DACA will also harm the state of Washington and the country as a whole, as  
18 these students will lose the opportunity to obtain the education and skills needed to contribute to  
19 society up to their potential. In Washington, a fast-growing state with a large population of  
20 DACA residents, there is a high demand for an educated and skilled workforce. DACA students  
21 are crucial to meeting that demand.

22 12. I declare under penalty of perjury under the laws of the State of Washington that  
23 the foregoing is true and complete to the best of my knowledge.

24 Dated this 5th day of September, 2017.

25   
26 Lucila Loera